

Barbara A. Rohr SBN 273353  
Email: brohr@faruqilaw.com  
**FARUQI & FARUQI, LLP**  
10866 Wilshire Boulevard, Suite 1470  
Los Angeles, CA 90024  
Telephone: 424-256-2884  
Facsimile: 424-256-2885

Richard W. Gonnello (*pro hac vice* forthcoming)  
Email: rgonnello@faruqilaw.com  
Sherief Morsy (*pro hac vice* forthcoming)  
Email: smorsy@faruqilaw.com  
**FARUQI & FARUQI, LLP**  
685 Third Avenue, 26th Floor  
New York, NY 10017  
Telephone: 212-983-9330  
Facsimile: 212-983-9331

*Attorneys for Proposed Lead Plaintiff Shinu Gupta*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

JAMES ERICKSON, Individually and  
on Behalf of All Others Similarly  
Situating,

Plaintiff,

vs.

SNAP INC., EVAN SPIEGEL, and  
ANDREW VOLLERO,

Defendants

No. 2:17-cv-03679-SVW-AGR

**NOTICE OF SHINU GUPTA'S  
MOTION FOR  
(1) APPOINTMENT AS LEAD  
PLAINTIFF AND (2) APPROVAL  
OF LEAD COUNSEL**

**CLASS ACTION**

Judge: Hon. Stephen V. Wilson  
Hearing Date: August 14, 2017  
Time: 1:30 p.m.  
Courtroom: 10A, 10th Floor

**NOTICE OF MOTION**

**TO: ALL PARTIES AND THEIR COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that on August 14, 2017, or on a date and time set by this Court, Shinu Gupta (“Gupta”), by and through his counsel, will and does hereby move this Court for an order granting Gupta’s motion for appointment as Lead Plaintiff and approval of his counsel as Lead Counsel (the “Motion”).

This Motion is brought pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”).<sup>1</sup> Gupta has timely filed his Motion and is the “most adequate plaintiff” under the rules of the PSLRA. Moreover, Gupta meets the requirements of Rule 23 of the Federal Rules of Civil Procedure for the purposes of this Motion as his claims are typical of the other purported class members’ claims and he will fairly and adequately represent the putative class. Gupta also seeks the Court’s approval of his selection of Faruqi & Faruqi, LLP, a law firm with substantial experience in prosecuting securities fraud class actions, as Lead Counsel pursuant to 15 U.S.C. § 78u-4(a)(3)(B)(v).

This Motion is based on the accompanying memorandum of points and authorities in support hereof, the declaration of Barbara A. Rohr filed herewith, the pleadings and other filings herein, and other such written and oral argument as may be permitted by the Court.

Dated: July 17, 2017

Respectfully submitted,

By: /s/ Barbara A. Rohr  
Barbara A. Rohr

<sup>1</sup> Local Civil Rule 7-3 requires a conference of counsel prior to filing motions. Due to the PSLRA’s lead plaintiff procedure, however, Gupta will not know which other class members may move for appointment as Lead Plaintiff until after all the movants have filed their respective motions. Under these circumstances, Gupta respectfully requests that the conferral requirement of Rule 7-3 be waived.

**FARUQI & FARUQI, LLP**

Barbara A. Rohr  
SBN 273353  
10866 Wilshire Boulevard, Suite 1470  
Los Angeles, CA 90024  
Telephone: 424-256-2884  
Facsimilie: 424-256-2885  
Email: brohr@faruqilaw.com

Richard W. Gonnello (*pro hac vice* forthcoming)  
Sherief Morsy (*pro hac vice* forthcoming)

**FARUQI & FARUQI, LLP**

685 Third Avenue, 26th Floor  
New York, NY 10017  
Telephone: 212-983-9330  
Facsimile: 212-983-9331  
E-mail: rgonnello@faruqilaw.com  
smorsy@faruqilaw.com

*Attorneys for [Proposed] Lead Plaintiff Shinu  
Gupta and [Proposed] Lead Counsel for the  
Class*